



# *Gulf Coast Aeronautical Services*

A Gulf Coast Based, Worldwide Aviation Training Solution

May 11th, 2021

**Federal Aviation Administration**  
**ASW-142 CMO, SW33 TCPM**  
**Attn: Mr. Mark J. Valette**  
**8700 Freeport Parkway STE 200B**  
**Irving TX 75063**

REF: ATP CTP Virtual Classroom - Distance Learning Compliance Letter

Dear Sir:

Attached to this letter is the supporting documentation for Gulf Coast Aeronautical Services Distance Learning Training program through a Virtual Classroom medium for the Airline Transport Pilot Certification Training Program (A304) Specialty Course.

Compliance Statement:

**Applicability:** The proposed distance learning program is to continue operations of the Airline Transport Pilot Certification Training Program's Academic phase of training presented in a virtual classroom environment as an ordinary course offering post-COVID-19 approved deviation. Our proposal will maintain the current conditions and limitations (updated) issued under the original Virtual Classroom Deviation approval letter dated April 30th, 2020.

Since Virtual Classroom is not directly referenced in FAA Order 8900.1, GCAS uses the following guidance for Distance Learning under FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436B for compliance.

Gulf Coast Aeronautical Services holds final approval authority for the Airline Transport Pilot Certification Training Program in Training Specification A304.

**Application:** The compliance statement letter for distance learning contains the following attachments:

1. Gulf Coast Aeronautical Training Control Manual Volume 6
2. Distance Learning Courseware Multimedia – Detailed courseware times and credit
3. 04/30/2020 Original Remote Classroom Deviation Approval Letter
4. LMS Generated Final Exams & Quiz (2) - Samples
5. Gulf Coast Aeronautical Master Question File
6. Use of Video and Communication Technology (VCT)

[[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 C2](#)]

The body of the compliance statement letter will contain the requirements listed in [FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436], and how Gulf Coast Aeronautical will meet the guidance required for distance learning of the ATP CTP academic phase of training.

Gulf Coast Aeronautical requested and received a distance learning course observation through the 142 CMO, Mr. Dan Little TCPM for Gulf Coast Aeronautical at the time. Mr. Little observed the ATP CTP Academic phase of training for proof of concept of COVID-19 Virtual Remote Classroom authorization, to include course entry procedures, ground school instruction, and validation exam administration for post-academics. The results of the validation exam were a class average of 96%, with all students testing using the Learning Management System test generation system.

PO BOX 724 Freeport FL 32439-0724  
1.800.588.9325

Upon completion of the Virtual Classroom and validation exam, 30 hours of course credit will be given to the client for Academic training only.

[\[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 C3\]](#)

Distance learning is not applied or credited for any flight training module/elements of Gulf Coast Aeronautical's Airline Transport Pilot Certification Training Program.

[\[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 C4\]](#)

The curricula submitted for distance learning is knowledge-based training only and is based on currently approved courseware for the Airline Transport Pilot Certification Training Program under Training Specification A304.

[\[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 D\]](#)

Gulf Coast Aeronautical's submission of distance learning, Video and Communication Technology (VCT) is a 30-hour course offering, 66% of the comprehensive training required for course completion.

[\[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 E\]](#)

The instructional media involved is extracted from the currently approved multimedia with minor modifications, allowing instructors to have download links for video modules in case of low bandwidth issues during virtual classroom presentations. Daily review materials are also available to the clients using Dropbox links.

After daily module completion, the instructor is available for one-on-one instruction/clarification using VCT. The daily VCT sessions are also available to the client for review. The VCT sessions are also available upon request by the TCPM to meet surveillance requirements. Recorded sessions will remain open for 15 days after course completion and are reviewed by the GCAS President and Director of Training for Quality Control purposes.

**Implementation Plan:**

[Startup \[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F1\]](#)

Gulf Coast Aeronautical has been operating under the original remote site - virtual ground training successfully for over a year. Our implementation plan is to continue remote site virtual ground school as currently conceived and operated under FAA Order 8900.1 Volume 3 Chapter 54 Section 6.

[Validation Strategy \[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2\]](#)

A 12-month random sample from past clients was used to establish a baseline group to compare traditional classroom methods and validate the distance learning effectiveness. These extractions indicate there were no academic failures or remediations.

The average academic End of Course test score was 92%. All incorrect responses during testing were corrected to 100% as per Gulf Coast Aeronautical Services Training Control Manual Volume 6. Over the sample period, there were no end-of-course exam failures.

[\[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2a1\]](#)

- 1) The initial validation of the courseware was to use a control group of pilots with varying levels of experience with at least the essential entry level requirement to be enrolled in the Airline Transport Pilot Certification Training Program. The experience level of the control group of clients:
  - a) Pilot 1 – Commercial Pilot SEL/MEL Inst. rated – 16 years civilian aviation, 1,420 hours total time.
  - b) Pilot 2 – Commercial Pilot SEL/MEL Inst. rated, L-382J type rating – 13 years military aviation, 2,042 hours total time.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2a1]

The average academic End of Course test score for this sample group was 92%

- 2) The last distance learning validation group was VCT ATP CTP Classes 030821 & 040321. The following lists the flight experience level of both control groups:

ATP CTP Class 030821

- a) Pilot 1 – Commercial Pilot SEL/MEL Inst. rated, no PIC type ratings – 6 years corporate aviation experience, current in BE58, C414, E50P, C525, C501, approximately 1,600 total hours.
- b) Pilot 2 – Commercial Pilot SEL/MEL Inst. rated, EMB-505 PIC type rating, 7 years corporate aviation experience, current in EMB-505, BE9L, C340. Approximately 1,830 total hours.

ATP CTP Class 040321

- a) Pilot 1 – Commercial Pilot SEL/MEL Inst. rated, SA-227 type rating – 11 years corporate aviation experience current and qualified SA-227 Captain 2,369 total hours.
- b) Pilot 2 – Commercial Pilot SEL/MEL Inst. no type ratings – 18 years of civilian and US Military aviation, current and qualified F-15 test pilot, 2,500+ total hours.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2a1]

The average academic End of Course test score for these sample groups was 95%

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2a2]

- 2) GCAS maintains a relationship with the FAA, Flight Safety Foundation, Air Line Pilots Association, International, Aircraft Owners & Pilot Association, and §121 air carrier operators to maintain the relevance of the courseware content.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2a3]

- 3) GCAS uses commercial software 'Easy LMS' to track student overall performance, missed questions, end of course test question & answer validity.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2b1]

- 4) Each end of course examination has at a minimum of eight Aerodynamic questions, two Meteorology Questions, 14 questions on Air Carrier Operations, and six questions concerning Leadership and professional development as required from AC 61-138. We extract these questions from a master question bank from Training Control Manual Volume 6, Chapter 4 to randomize questions administered to the client.
- 5) This allows GCAS to also identify any potential client weakness in a training module.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2b2&3, and F2c]

- 6) GCAS maintains the End Of Course Validation exams on the secure portion of the GCAS LMS website. Only authorized Instructor Pilots, Training Center Evaluators, or the Administrator have access to the End Of Course validation examination. The test results are maintained on the LMS database.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F3c]

- 7) The element or objective within the validation exam. Distance learning validation exams will be conducted in a proctored environment and observed by a qualified instructor or the Administrator. All students that meet or exceed the minimum grade of 80 percent will have their test corrected to 100 percent immediately following the exam. A score of less than 80 percent will require the student to be retrained and tested in the substandard areas by a qualified instructor in a proctored environment. Distance learning techniques or procedures will not be used to accomplish any required retraining resulting from an unsatisfactory exam. Subsequent reexamination will be performed using a random test generator to ensure the individual is not subjected to the same test that was initially taken. All training and testing must be satisfactorily accomplished before the student may continue to the FSTD phase of training.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F4a]

- 8) GCAS maintains an approved Master Question File for distance learning, virtual classroom, and traditional ground school training methods. The design of the Master Question file encompasses all modules and elements of the subject areas listed in GCAS Training Control Manual Volume 6 Chapter 4.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2b2&3, and F4b]

- 9) Multiple questions are developed for each training element objective. The question bank includes enough questions that can be randomized for each subject matter element. The Validation Exam is a 50-question exam. Questions distribution is; 26% aerodynamics, 7% Meteorology, 47% Air Carrier Operations, 20% Leadership and Professional Development.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2b2&3, and F4c]

- 10) Except baseline testing of the initial evaluation period of the distance learning program. Tests will be generated by a random selection of questions from the Master Question File library so that no two tests are alike. This uniqueness does not refer to merely switching the order of the answers to a particular question without changing the question itself. Random answers to the same question do not qualify the question as being different for this requirement.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436 F2b2&3, and F4d]

- 11) Test questions will be reviewed annually to assure their relevancy, and to incorporate new or changed material. GCAS has a quality review procedure in place to ensure currency of their question banks.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436, F4e]

- 12) GCAS ensures the identity of the client upon sign in at the satellite center with the Instructor Pilot. The client's credentials are inspected and compared to their student records, prior to validation testing. Printed or electronic test answers will not be able to be reproduced and distributed among trainees so as to beat the test. If a paper test is issued for testing, the test will be graded by the proctor, through the LMS gateway and corrected to 100%, then the test will be destroyed. If the test is conducted electronically the test is graded and corrected to 100%, stored in the database and is deleted from the electronic device.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436, F4d)]

- 13) GCAS's has quality control procedures in place for the collection, protection, and analysis of data for tracking ground training effectiveness, in its current quality reviews of curriculum(s). With the addition of the distance learning program GCAS will review annually the necessity to upgrade multimedia, and software programs. Feedback from Instructors and clients will be heavily weighted in the quality review.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436, G1]

- 14) GCAS has the capability to provide customer support through its web conferencing to our clients during normal business hours. The conferencing system allows simultaneous viewing of multimedia products, systems schematics, and documents to assist the clients with the distance learning environment.

[FAA Order 8900.1 Volume 3 Chapter 54 Section 6, 3-4436, G2]

- 15) Before on-site validation testing, clients will be convened in a proctored classroom setting with an authorized ground instructor to resolve any remaining issues arising during distance learning. This will be conducted after the formal course sign in process has been completed. This interactivity is beneficial in respect to the standardization of clients enrolled in the same distance learning course.

If you have any questions, please call me at 1-850-368-5800.

Best Regards,



Robert G. Minor, President

[gibm@gulfcoast.aero](mailto:gibm@gulfcoast.aero)

1-800-588-9325 Ext.3 or 1-850-368-5800

FAA Tracking GCAS 0XX

DRAFT